

Accountability and Student Coding

Accountability

- Data for economically disadvantaged students are necessary to meet some reporting and accountability requirements.
- For most LEAs, school lunch data, including CEP data, may be the best source to identify economically disadvantaged students.
- A state may choose to include only identified students in the economically disadvantaged subgroup.
- If survey data are available, a state may use those data to identify students in the economically disadvantaged subgroup. (i.e. Household Survey)

Differentiating Lunch and ED Status

USDA prohibits CEP schools from accepting FRPL applications. The inability to collect economically disadvantaged (ED) data using the application means:

Free/Reduced Lunch status **ED** status



- All students attending a CEP school receive lunch at no cost regardless of income; so
- There is no connection between receiving a free meal and household income; because
- Receiving a free lunch is no longer an indication of poverty or a condition of economic status.

Defining the Economically Disadvantaged Subgroup for Accountability

- For accountability purposes in 2015-16, only students who are directly certified will be considered part of the Economically Disadvantaged (ED) subgroup.
- A "directly certified" student is any student eligible to receive free lunch without an application, regardless of the district or school CEP status.

ED Subgroup for Accountability

Student classifications "J", "H", "I", and "U" will be used to define the ED subgroup for Accountability.

Classification	Description	2015-16 ED Accountability Subgroup (Y/N)	2015-16 Poverty Definition for Finance and Other Purposes (Y/N)
X	Free Lunch	N	Υ
Υ	Reduced Lunch	N	Υ
3	CEP Eligible	N	Υ
J	Direct	Υ	Υ
	Certification		
Н	Homeless	Υ	Υ
I	Migrant	Y	Υ
U	Runaway	Υ	Υ
L	Pre-K EconDis	N	Υ
E	Headstart Fund	N	Υ

ED Subgroup for Finance & Other Purposes

Student classifications will be used to define the ED subgroup for Finance and Other Purposes

Classification	Description	2015-16 ED Accountability Subgroup (Y/N)	2015-16 Poverty Definition for Finance and Other Purposes (Y/N)
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Remember Lunch Status ≠ ED Status

Do I still need to use codes "X", "Y" and "3"?

- **YES**, remember, these codes are used for various reasons and still provide necessary data.
- "X" and "Y" are relevant codes for school nutrition for funding (meal reimbursements), etc.
- "3" is still relevant for state funding as there is currently no change to the BEP definition for "at-risk" students.
 - Incremental at-risk funding based on students being "eligible" for free or reduced lunch.
 - The household survey uses the same income eligibility guidelines.

Student Coding

- If students are coded incorrectly OR not at all, this affects FUNDING and ACCOUNTABILITY!
- A student can be classified using multiple codes.
 - A student may be in a CEP eligible school and be migrant. The student would have multiple student classifications and would be coded as "3" AND "I" in the LEA student information system.



CEP Impact on Title I: Within-district Allocations to Schools

Within-district Allocations: Rank and Serve

The LEA must use a common poverty metric to rank order schools and allocate Title I funds on an equitable basis.

- Suggested metric 1: Multiply number of students identified by DC in a CEP school by the 1.6 multiplier, then divide by the enrollment of school (provides approximation percentage of free and reduced-price meal numbers) (DC x 1.6 multiplier)
 - Non-CEP schools use the FRLP
- Suggested metric 2: Rank all schools (CEP and non-CEP) based solely on the number students directly certified through SNAP only. (DC only)

Within-district Allocations: Rank and Serve

- Suggested metric 3: Multiply number of students identified by DC in a school (CEP and non-CEP) by the 1.6 multiplier, then divide by the enrollment of school (provides approximation percentage of free and reduced-price meal numbers) (DC x 1.6 multiplier CEP and non-CEP)
- Suggested metric 4 (TN): Rank CEP schools using the number of student identified by DC plus the number of unduplicated students identified through the household surveys (divided by the enrollment of the school)

^{*}Please check the latest guidance from the department or with your assigned Regional Consultant.

Within-district Allocations: Rank and Serve

- Title I ranking and serving procedures require school-level poverty data.
- Most rules regarding within-district allocations remain the SAME:
 - LEA serves schools in rank order by poverty percentage.
 - Schools over 75% must be served first.
 - Grade span grouping may only be applied after schools above 75% are served.
 - CEP and non-CEP schools may receive differentiated per pupil allocations (PPA).
 - Per pupil allocations for high poverty schools must not be less than lower poverty schools.
 - LEA may stop serving schools at any point in the rank order.

Within-district Allocations: Poverty Data

- If all schools are participating in CEP, only use DC data.
 - Choices of school-level poverty measures include school lunch data as an option.
 - CEP data are part of school lunch data.
 - ED CEP guidance on within-district allocations applies when a school district has a CEP school and uses school lunch data to rank and serve schools.
- If some schools are participating CEP, only use DC for all schools OR use DC data for CEP schools and an allowable alternate method for non-CEP schools.

Multiplier Impact: Child Nutrition vs. Title I

- For USDA reimbursement purposes, the "identified students" percent is multiplied by USDA factor of 1.6.
- For Title I school allocation purposes, the 1.6 is applied when some schools are CEP AND non-CEP schools will collect data through Free/Reduced Lunch (including federal FRLP and/or state household survey).

Questions





Districts and schools in Tennessee will exemplify excellence and equity such that all students are equipped with the knowledge and skills to successfully embark on their chosen path in life.

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1-800-232-5454

Notifications can also be submitted electronically at:

http://www.comptroller.tn.gov/hotline